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And Kieran Paul Cassidy  
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10 UNITED STATES DISTRICT COURT  
11 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

12 REACHLOCAL, INC.,  
13  
14 Plaintiff,  
15 vs.  
16 PPC CLAIMS LIMITED AND  
KIERAN PAUL CASSIDY,  
17  
18 Defendants

Case No. 2:16-cv-1007-R-AJW

Judge: Hon. Manuel L. Real

**PPC CLAIMS LIMITED AND  
KIERAN PAUL CASSIDY'S  
APPLICATION FOR LEAVE TO  
FILE UNDER SEAL**

[Filed concurrently: PPC Claims  
Limited and Kieran Paul Cassidy's  
Application for Leave to File Under  
Seal; Declaration of Erik Syverson;  
Redacted Exhibits A & B and Certain  
Portions of the Motion for Summary  
Judgement Are Proposed to be  
Filed Under Seal; Unredacted Materials  
Proposed to be Filed Under Seal; and  
[Proposed] Order]]

1 Pursuant to Local Rule 79-5, Defendants' PPC Claims Limited and Kieran  
2 Paul Cassidy ("Defendants") hereby apply for leave of Court to file Exhibits A & B  
3 to the Declaration of Erik Syverson in Support of Application for Leave To File  
4 Under Seal. Exhibit A are excerpts from the deposition of Sharon Rowlands and  
5 Exhibit B are excerpts from Plaintiff's initial disclosures. Portions of both exhibit  
6 were marked confidential by Plaintiff.

7 Defendants also apply for leave of Court to file the declaration of Kris  
8 Barton under seal. This was marked confidential by Plaintiff.

9 Defendants also apply for leave of Court to redact certain portions of the  
10 Motion that refer to information Plaintiff's appear to deem confidential.

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12 Dated: September 2, 2016

RAINES FELDMAN LLP

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15 By: /s/ Erik S. Syverson

16 ERIK S. SYVERSON  
17 Attorneys for Defendants PPC Claims  
18 Limited and Kieran Paul Cassidy  
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